



US District Court 401 Courthouse Square, Alexandria, VA 22314

Vient, Plaintiff vs. Gannett Co., Inc., Defendant Case: 1:18: CV1562

Motion to Correct Defendant's Discovery Record

Pro-se Plaintiff Motions here to Correct Defendant's Discovery Record for this case.

On December 20, 2019, in response to Defendant's November 20, 2019 Discovery Requests, Pro-se Plaintiff produced 27 Documents to Defendant. (Attached here as Exhibits.)

It appears that Defendant did not include these 27 Documents in Defendant's Motions regarding assertions to the Court about Plaintiff's Discovery production. (see Defendant's Doc. 105 Exhibits A through M).

In a Court Hearing on February 7, 2020, Defendant asserted that Exhibit E of Doc. 105 represents all of Plaintiff's responsive documents to Defendant's discovery requests. This is therefore inaccurate, as Exhibit E does not include these 27 Documents.

These 12/20/19 Documents (Exhibits attached here) evidence usage by the Lebanon Daily News and/or Florida Today of Plaintiff's registered works listed in this case.

Plaintiff has requested details of this usage from Defendant in Plaintiff's Discovery Requests. (And before this ever became a case, when Plaintiff hoped to resolve amicably between parties.) To date, Defendant has not answered these Discovery requests, thus necessitating the Motion to Compel, filed contemporaneously here.

Respectfully submitted,


Benjamin Vient, Plaintiff Pro-Se

CERTIFICATE OF MAILING I HEREBY CERTIFY that on 2020, per previous agreement between parties to use designated email addresses, I sent a true and correct copy of the foregoing to Laurin Mills at laurin@samek-law.com.

 Benjamin Vient